

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X)	Civil Action No.:
LARRY SAMMS)	
)	
Plaintiff,)	15-cv-02741-JSR
V.)	
)	NOTICE OF MOTION
ABRAMS, FENSTERMAN, FENSTERMAN,)	TO FILE UNDER SEAL
EISMAN, FORMATO, FERRARA, & WOLF, LLP)	
)	
)	
Defendants.)	
-----X)	

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law and Declaration of Anthony J. Genovesi Defendant ABRAMS, FENSTERMAN, FENSTERMAN, EISMAN, FORMATO, FERRARA, & WOLF, LLP will move this Court before the Honorable Judge Jed S. Rakoff, at the United States Courthouse, Courtroom 14B, 500 Pearl Street New York, New York, at a time to be determined by the Court for an order granting Defendant leave to file documents covered by a protective order under seal.

Dated: June 1, 2016

Respectfully Submitted,

s/ Anthony J. Genovesi, Jr.
Anthony J. Genovesi, Jr., Esq.

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ON NOTICE TO:

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CERTIFICATE OF SERVICE

I certify that on the 9th day of December, 2015 a copy of this NOTICE OF MOTION FOR SUMMARY JUDGMENT was filed electronically in the ECF system. Notice of this filing will be sent to the parties of record by operation of the Court's electronic filing system, including plaintiff's counsel, as described below. Parties may access this filing through the Court's Electronic Filing System

The Law Office of Ahmad Keshavarz
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Brooklyn, New York 11201

The undersigned further certifies that one courtesy copy of the said Motion will promptly be submitted to the Court to: Honorable Jed Rakoff, U.S.D.J. United States District Court, 500 Pearl Street New York, NY.

Dated: December 9, 2015